

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. 08-_____
v.	:	DATE FILED: January 16, 2008
ANDREW ROWE	:	VIOLATIONS:
	:	18 U.S.C. § 1028A(a) (aggravated identity
	:	theft - 1 count)
	:	18 U.S.C. § 1542 (making false statement
	:	in United States passport application -
	:	1 count)
	:	18 U.S.C. § 1425(a) (fraudulently
	:	attempting to obtain citizenship - 1 count)
	:	18 U.S.C. § 911 (falsely representing to be
		United States citizen - 1 count)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about September 10, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendant

ANDREW ROWE

knowingly and without lawful authority transferred, possessed, and used a means of identification of another person, that is, a name, date of birth and social security number of another person, during and in relation to defendant ROWE's fraudulent renewal application for an United States passport, in violation of Title 18, United States Code, Section 1542.

In violation of Title 18, United States Code, Section 1028A(a)(1) and (c)(7).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 10, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendant

ANDREW ROWE

an alien, a native, and a citizen of Jamaica, knowingly and willfully made false statements in an application for a United States passport, with intent to induce and secure for his own use, the issuance of a passport under the authority of the United States, contrary to the laws regulating the issuance of passports and the rules prescribed pursuant to such laws, that is, defendant ROWE submitted a renewal passport application using the name, date of birth, and social security number of another person, identified here as R.T., and falsely represented that he was R.T., which statements defendant Rowe knew to be false.

In violation of Title 18, United States Code, Section 1542.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 10, 2007, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

ANDREW ROWE

an alien, a native, and citizen of Jamaica, falsely and willfully represented himself to be a citizen
of the United States.

In violation of Title 18, United States Code, Section 911.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 26, 2001, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

ANDREW ROWE

knowingly attempted to procure and obtain, contrary to law, naturalization as a United States citizen for himself, by making in connection with his application for naturalization a material false statement, sworn under oath during an interview with an official of the United States Immigration and Naturalization Service and on Form N-400, that he had never previously claimed to be a United States citizen, when in fact, as defendant ROWE knew, this statement was false.

In violation of Title 18, United States Code, Sections 1425(a).

_____**A TRUE BILL:**

_____**GRAND JURY FOREPERSON**

PATRICK L. MEEHAN
United States Attorney